

## **ANNEX D: PLAN REVIEW AND UPDATE PROCEDURES AND SCHEDULE**

### **APPENDIX I - Revision and Update Requirements**

The Unified Plan will be reviewed annually and revised as necessary by the EPA, US Coast Guard and ADEC in consultation with the Alaska Regional Response Team (ARRT) and State Emergency Response Commission (SERC). Proposed changes should be submitted directly to the Coast Guard's Marine Safety Division, EPA's Alaska Operations Office, or ADEC's Prevention and Emergency Response Program office.

Subarea Committees, in consultation with appropriate Local Emergency Planning Committees, will prepare, annually review and revise the subarea plans as necessary. Any part of this Plan or the ten subarea contingency plans may be changed as conditions warrant.

All changes to the Unified Plan or the Subarea Contingency Plans must be noted on the record of changes page.

The overall process for development, review, and promulgation of the Unified Plan is depicted by **Figure 1, Unified Plan Review and Promulgation Process**.

## **APPENDIX II - Exercises and Drills**

### **General:**

#### **State Discharge Exercise Requirements (18 AAC 75.485):**

The ADEC will, in its discretion, conduct announced and unannounced discharge exercises to assure that an oil discharge prevention and contingency plan is adequate in content and execution. No more than two exercises will be required in each twelve-month period, unless an exercise demonstrates (in the ADEC's judgement) a plan holder's failure to effectively implement the plan.

Execution of an industry contingency plan during a discharge exercise will be considered inadequate if the readiness for response and response performance stated in the plan are significantly deficient due to inadequate mobilization or performance of personnel, equipment, other resources, or other factors, including the mobilization or performance of a response action contractor identified under 18 AAC 75.445(i).

If a plan holder cannot adequately execute the plan during a discharge exercise, the ADEC will, in its discretion, require additional exercises until it is satisfied that plan execution is adequate, or take other appropriate action as described in 18 AAC 75.490.

The ADEC will consider a regularly scheduled training exercise initiated by a plan holder as a discharge exercise if the ADEC monitors, evaluates, or participates in the exercise and concurs that it is equivalent to a discharge exercise conducted by the ADEC. An industry contingency plan holder shall notify the ADEC in advance of the exercise and shall provide an opportunity for an ADEC representative to be present and participate.

The ADEC will conduct announced or unannounced discharge exercises appropriate to the plan holder's current status of operations.

#### **Federal Discharge Exercise Requirements:**

The guidance contained in the National Preparedness for Response Exercise Program (PREP) will be used in conducting federally mandated exercises. The PREP was developed to establish an exercise program which meets the intent of section 4202(a) of the Oil Pollution Act of 1990 (OPA 90), amending section 311(j) of the Federal Water Pollution Act by adding a new subsection (7) for spill response preparedness [33 U.S.C. 1321(j)(7)]. The PREP was developed to provide a mechanism for compliance with the exercise requirements, while being economically feasible for the government and the oil and hazardous substance industry to adopt and sustain. The PREP is a unified federal effort and incorporates the exercise requirements of the Coast Guard, EPA, the Research and Special Programs Administration (RSPA) Office of Pipeline Safety, and the Minerals Management Service. Following the PREP guidelines and participation in the PREP will satisfy all OPA 90 mandated federal pollution response exercise requirements.

The OSC (both Federal and State) shall periodically (annually at a minimum) conduct scheduled or no notice oil pollution response drills to assess the effectiveness of this Unified Plan, the appropriate Subarea Contingency Plan (for the location exercised) and relevant tank vessel and facility response plans.

The agency sponsoring the exercise/drill will be responsible for coordinating a joint evaluation team and issuing a single report that evaluates the overall exercise performance. The single evaluation report should be released within 45 days after completion of the exercise.

The purpose of response drills is to familiarize staff with basic spill response procedures and evaluate their effectiveness. Drill types include:

Notification Exercises:	intra-agency inter-agency (Federal, State) local-state-federal-industry
Table-Top Exercises:	intra-agency inter-agency (Federal, State) local-state-federal-industry
Field Exercises:	intra-agency inter-agency (Federal, State) local-state-federal-industry

Notification exercises merely test call-out plans and communications systems. Table-top exercises entail gathering responders in one or several locations to test their ability to respond to scenarios. Field exercises entail actually moving personnel and equipment into the field to practice containment and cleanup. Logic dictates that drills progress over time from telephone to field. Once the system performs adequately during announced drills, the appropriate Federal or State agency may conduct unannounced spill drills in order to improve readiness among government personnel. The benefits of frequent exercising have to be weighed against the costs.

The Unified Plan can be exercised in cooperation with Federal, State, Local and industry drills to maximize the combined resources and improve coordination among the parties.

Internal exercises include:

- Qualified Individual notification exercises;
- Emergency procedures exercises for vessels and barges;
- Emergency procedures exercises for facilities (optional);
- Spill management team tabletop exercises; and
- Equipment deployment exercises.

External exercises include:

- Area exercises; and
- Government-initiated unannounced exercises.

The primary purpose of the area exercises is to activate and observe the response infrastructure in the area, and the ability of the entire response community to effectively conduct a spill response. The focus should be on the interaction between the responsible party and the federal, state, and local government to exercise both the Sub-Area/Regional Contingency Plan and the responsible party's plan. An adequate level of response equipment will be deployed, consistent with the scenario.

Additionally, over a three-year cycle, the exercise program should exercise the 15 core components of the response plans. The 15 core components are:

#### Organizational Design

- 1) Notifications
- 2) Staff Mobilization
- 3) Ability to Operate within the Response Management System described in the Plan

#### Operational Response

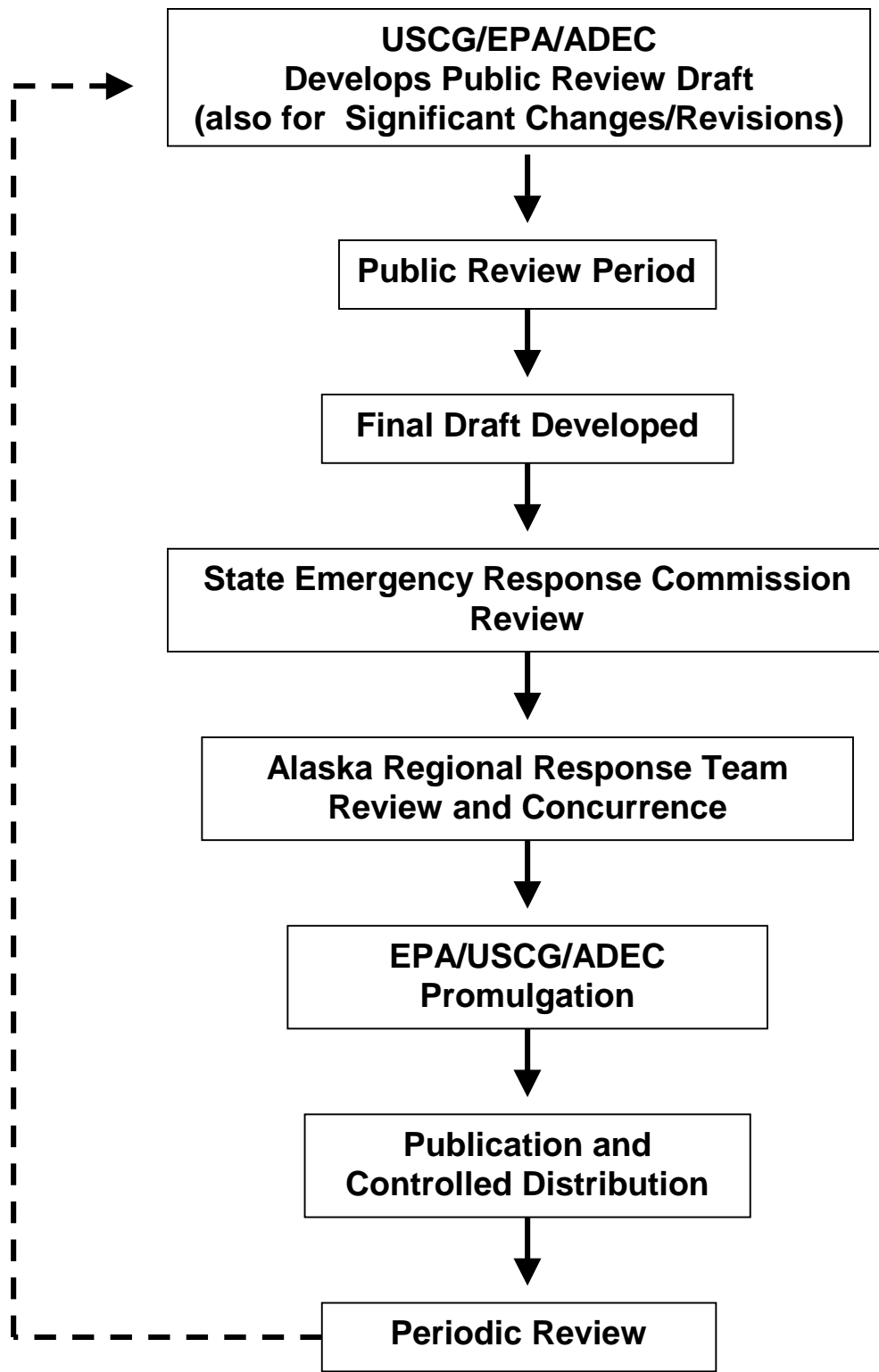
- 4) Discharge Control
- 5) Assessment of Discharge
- 6) Containment of Discharge
- 7) Recovery of Spilled Material
- 8) Protection of Sensitive Areas
- 9) Disposal of Recovered Material and Contaminated Debris

#### Response Support

- 10) Communications
- 11) Transportation
- 12) Personnel Support
- 13) Equipment Maintenance and Support
- 14) Procurement
- 15) Documentation

The Coast Guard's COMDTINST M3010.21 (Exercise Planning Manual) may also be used as an available tool for exercise planning and execution.

**Figure 1: UNIFIED PLAN  
REVIEW AND PROMULGATION PROCESS**



**(THIS PAGE INTENTIONALLY BLANK)**